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27 **UNITED STATES DISTRICT COURT**
28 **NORTHERN DISTRICT OF CALIFORNIA**

29 CHASOM BROWN, WILLIAM BYATT,
30 JEREMY DAVIS, CHRISTOPHER
31 CASTILLO, and MONIQUE TRUJILLO
32 individually and on behalf of all other
33 similarly situated,

34 Plaintiffs,

35 vs.

36 GOOGLE LLC,

37 Defendant.

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Case No.: 5:20-cv-03664-LHK

**DECLARATION OF RYAN MCGEE IN
SUPPORT OF THE ADMINISTRATIVE
MOTION TO SEAL JOINT DISCOVERY
STATEMENT**

Referral: Hon. Susan van Keulen, USMJ

DECLARATION OF RYAN MCGEE

I, Ryan McGee, declare as follows.

1. I am a partner with the law firm of Morgan & Morgan, P.A., counsel for Plaintiffs in this matter.

2. Pursuant to Civil Local Rule 79-5, I submit this declaration in support of the Administrative Motion to Seal portions of the parties' Joint Discovery Statement. ECF No. 139. In making this request, Plaintiffs have carefully considered the relevant legal standard and policy considerations outlined in Civil Local Rule 79-5. Plaintiffs make this request with the good faith belief that the information sought to be sealed consists of Plaintiffs' highly sensitive and confidential information.

3. Plaintiffs respectfully request that the Court seal the redacted portions of Chart C of the Joint Discovery Statement, filed at ECF No. 139-3. Plaintiffs only ask that the Court seal the portions relating to Plaintiffs' redactions contained in Chart C of the Joint Discovery Statement, particularly at Pages 30, 31, 32, 36, 37, but do not otherwise seek any redactions related to the Joint Discovery Statement.

4. The information Plaintiffs request to be sealed contains Plaintiffs' highly sensitive and confidential private browsing history and personal email addresses. This information was provided in response to Google's discovery requests, in particular Google's First Set of Interrogatories. Plaintiffs have maintained throughout this litigation that such private browsing history and personal email addresses are confidential and not subject to disclosure and have designated these details as confidential under the entered protective order.

5. The information sought to be sealed is narrowly tailored to seek sealing only of the Plaintiffs' highly sensitive and confidential private browsing history and personal email addresses, and Plaintiffs do not otherwise request sealing of any other information.

6. For these reasons, Plaintiffs respectfully request that the Court order the redacted portions of Chart C of the Joint Discovery Statement to be filed under seal.

1 I declare under penalty of perjury under the laws of the United States of America that the
2 foregoing is true and correct. Executed this 23d day of April, at Tampa, Florida.

3 /s/ Ryan J. McGee

4 Ryan J. McGee
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